

**DECLARATION OF  
VIOLA TREBICKA  
IN SUPPORT OF  
MOTION TO  
EXCLUDE  
OPINIONS OF  
PLAINTIFFS'  
DAMAGES EXPERT  
MICHAEL J.  
LASINSKI**

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*Counsel for Defendant Google LLC*

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et.al*, individually and  
on behalf of all similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF VIOLA TREBICKA  
IN SUPPORT OF MOTION TO  
EXCLUDE OPINIONS OF PLAINTIFFS'  
DAMAGES EXPERT MICHAEL J.  
LASINSKI**

Judge: Hon. Yvonne Gonzalez Rogers

Date: September 20, 2022

Time: 2:00 p.m.

Location: Courtroom 1 – 4th Floor

1 I, Viola Trebicka, declare as follows:

2 1. I am a member of the bar of the State of California and a partner with Quinn Emanuel  
3 Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action. I submit  
4 this declaration in support of Google’s Motion to Exclude Opinions of Plaintiffs’ Damages Expert  
5 Michael J. Lasinski. I make this declaration of my own personal, firsthand knowledge, and if called  
6 and sworn as a witness, I could and would testify competently thereto.

7 2. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the  
8 deposition of Michael J. Lasinski, taken in this litigation on July 20, 2022 (“Lasinski Deposition”).

9 3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration of Bruce  
10 A. Strombom In Support of Google’s Opposition to Plaintiffs’ Motion for Class Certification, which  
11 attaches a true and correct copy of Mr. Strombom’s Expert Report, dated May 27, 2022.

12 4. Attached hereto as Exhibit 3 is a true and correct copy of the document marked as  
13 Exhibit 15 at the Lasinski Deposition.

14 5. Attached hereto as Exhibit 4 is a true and correct copy of the document bearing  
15 Bates Number GOOG-CABR-00116174, which was produced by Google in this litigation.

16 6. Attached hereto as Exhibit 5 is a true and correct copy of the document bearing  
17 Bates Number GOOG-CABR-04703695, which was produced by Google in this litigation.

18 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the transcript  
19 of the deposition of Bruce Schneier, taken in this litigation on July 18, 2022.

20 8. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the transcript  
21 of the deposition of Jonathan Hochman, taken in this litigation on July 21, 2022.

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1 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
2 and correct. Executed in Los Angeles, California on August 5, 2022.

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5 By /s/ Viola Trebicka

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